

# **—HONORARY—**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

March 20, 2019

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Kristin D. Roser/Ben Holly *KDR BH*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Reason To Believe Recommendation - 2018 30 Day Post-General Report  
(Unauthorized Filers) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2018 30 Day Post-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized committees that failed to file or timely file the 2018 30 Day Post-General Report.

The committees appearing on the 30 Day Post-General Report list either failed to file the report, filed the report within thirty (30) days of the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. § 111.43, these committees should be assessed the civil money penalties indicated in the attachment.

In order to determine the level of activity for unauthorized quarterly filers that failed to file or failed to timely file the 30 Day Post-General Report, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2018 through November 26, 2018 (57 days), was reviewed for activity which would have required the filing of a 12 Day Pre-General Report (12 Day Report). If our research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 29.82% (17 days (12G Filing Period)/57 days (30G Filing Period)).
- The committees identified through this process as failing to file or failing to timely file the 12 Day Report were included in the Reason to Believe Recommendation circulated to the Commission on March 13, 2019. If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will also be assessed a fine for the 30 Day Report based on the estimated levels of activity described above and are included on the attached list.
- Every Year-End Report (YE) submitted by an unauthorized quarterly filer that covered the period from October 1, 2018 through December 31, 2018 (92 days) was reviewed for activity which would have required the filing of a 30G. If our research indicated that a 30G was required, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 61.96% (57 days (30G Filing Period)/92 days (YE Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 30G. If the same committee was required to file the 12 Day Report, but failed to file this report, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 43.48% (40 days (30G Filing Period)/92 days (YE Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 30G.

## Recommendation

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

3/19/2019 3:02 PM

Federal Election Commission  
Reason to Believe Circulation Report  
2018 POST-GENERAL Not Election Sensitive 12/06/2018 UNAUTH

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3622	C00492579	AMERICAN PRINCIPLES	EYTAN LAOR	\$313,566	1	1/23/2019	48 (Not Filed*)	\$52,662	\$4,906
3624	C00658757	AMERICANS SUPPORTING VETERANS PAC	MARK SLY	\$576,156	0	12/23/2018	17	\$78,172	\$3,063

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AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
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3644	C00157941	PEACE ACTION PAC/ FKA SANE/FREEZE PAC	ROSALIE GREENE	\$167,510	0	12/26/2018	20	\$76,996	\$3,501
3645	C00131706	PIPEFITTERS LOCAL UNION #524	PATRICK DOLAN	\$194,859	0		Not Filed	\$32,477 (est)	\$1,230

3655	C00522458	TOGETHER WE THRIVE	CHRISTOPHER ZULLO	\$133,515	0		Not Filed	\$19,074 (est)	\$684
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\* The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.

# Introduction

In the Matter of )  
Reason To Believe Recommendation - 2018 )  
30 Day Post-General Report (Unauthorized )  
Filers) for the Administrative Fine Program: )

AMERICAN PRINCIPLES, and LAOR, ) AF# 3622  
EYTAN as treasurer; )

AMERICANS SUPPORTING VETERANS ) AF# 3624  
PAC, and SLY, MARK as treasurer; )

Federal Election Commission  
Certification for Administrative Fines  
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PEACE ACTION PAC/ FKA ) AF# 3644  
SANE/FREEZE PAC, and ROSALIE )  
GREENE as treasurer; )  
PIPEFITTERS LOCAL UNION #524, and ) AF# 3645  
DOLAN, PATRICK as treasurer; )

TOGETHER WE THRIVE, and  
CHRISTOPHER ZULLO as treasurer;

) AF# 3655  
)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission,  
do hereby certify that on March 21, 2019 the Commission took the following actions  
on the Reason To Believe Recommendation - 2018 30 Day Post-General Report  
(Unauthorized Filers) for the Administrative Fine Program as recommended in the  
Reports Analysis Division's Memorandum dated March 20, 2019, on the following  
committees:



AF#3622 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICAN PRINCIPLES, and LAOR, EYTAN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3624 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICANS SUPPORTING VETERANS PAC, and SLY, MARK in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#3644 Decided by a vote of 4-0 to: (1) find reason to believe that PEACE ACTION PAC/ FKA SANE/FREEZE PAC, and ROSALIE GREENE in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3645 Decided by a vote of 4-0 to: (1) find reason to believe that PIPEFITTERS LOCAL UNION #524, and DOLAN, PATRICK in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

# MEMORANDUM

1970-1971 1972-1973

AF#3655 Decided by a vote of 4-0 to: (1) find reason to believe that TOGETHER WE THRIVE, and CHRISTOPHER ZULLO in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

March 21, 2019

Date

Dayna C. Brown

Dayna C. Brown

Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 21, 2019

Christopher Zullo, in official capacity as Treasurer  
Together We Thrive  
3433 Lithig Pinecrest Rd, Ste 198  
Valrico, FL 33596

C00522458  
AF#: 3655

Dear Mr. Zullo:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period October 1, 2018 through November 26, 2018 shall be filed no later than December 6, 2018. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file the report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On March 21, 2019, the FEC found that there is reason to believe ("RTB") that Together We Thrive and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before December 6, 2018. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$684. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <https://www.fec.gov/af/pay.shtml> 11 CFR § 111.34. Your payment of \$684 is due within forty (40) days of the finding, or by April 30, 2019, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$19,074  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty



If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 1050 First Street, NE, Washington, DC 20002. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or April 30, 2019. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Together We Thrive and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

**5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <https://www.fec.gov/af/pay.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1158) or (202) 694-1158.

On behalf of the Commission,

*Ellen L. Weintraub*

Ellen L. Weintraub  
Chair

---

**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$684 for the 2018 Post-General Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit [www.fec.gov/af/pay.shtml](http://www.fec.gov/af/pay.shtml) to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**

---

FOR: Together We Thrive

FEC ID#: C00522458

AF#: 3655

PAYMENT DUE DATE: April 30, 2019

PAYMENT AMOUNT DUE: \$684

**Dear Federal Election Commission,**

RECEIVED  
FEC MAIL CENTER

2019 APR 30 PM 2: 28

In response to notice #AF3655 I would like to challenge this fine and subsequent fines up until the April 2019 reporting period on the following grounds.

- Assistance required with commission required software and learning curve.
- I have demonstrated efforts above and beyond to meet office reporting requirements.

Initially I was notified by your office about the need to reclassify filing information for categories of independent contributions. I contacted the office about clarification and started working on the hundreds of pages of refilling's. I filed by paper due to complexity of FEC software. After two periods completed, I was then notified that I would need to file electronically passing a certain dollar threshold, which I was not notified of with any of the previous correspondence I was dealing with the office about category classification. I contacted the office and was advised that it was best to refile all of 2018 electronically. I instructed the office I would need assistance and over the next month, played phone tag. When we did connect the instruction was slow but progressed. After several changes, meetings and adjustments, I now understand the online filing process, to some functional degree. I asked if there were any recommended companies to handle these filings and was told they did not have any and I have looked for a company to handle this accounting and there are none in my area.

At the current rate I can complete one report a week electronically to get caught up. Thank you for your time and attention to this matter. Please do not hesitate to contact me for any additional information.

Thank You  
Christopher Zullo



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 13, 2019

**REVIEWING OFFICER RECOMMENDATION  
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 3655 – Together We Thrive and Christopher Zullo, in his official capacity as Treasurer (C00522458)

**Summary of Recommendation**

Terminate the proceedings in accordance with 11 C.F.R. § 111.37(b) and close the file.

**Reason-to-Believe Background**

The 2018 Post-General Report was due on December 6, 2018. The respondents filed the report on May 28, 2019, 173 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On March 21, 2019, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Post-General Report and made a preliminary determination that the civil money penalty was \$684 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on March 21, 2019 to notify them of the Commission's RTB finding and civil money penalty.

**Legal Requirements**

The Federal Election Campaign Act ("Act") states that the treasurer of a committee not authorized by a candidate shall file a post-general report covering through the 20<sup>th</sup> day after the election no later than 30 days after the election. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(c)(1)(iii). Political committees required to file reports with the Commission must file in an electronic format if they have received contributions or made expenditures or expect to receive contributions or make expenditures in a calendar year aggregating in excess of \$50,000. 52 U.S.C. § 30104(a)(11) and 11 C.F.R. § 104.18(a). Reports electronically filed must be received and validated at or before 11:59 p.m. Eastern Standard/Daylight Time on the filing date to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

## Summary of Respondents' Challenge

On April 30, 2019, the Commission received the written response ("challenge") from the Treasurer. He states he is challenging the fine due to his need for assistance using FECFile, his learning curve, his demonstrated best efforts to meet reporting requirements, and his unavailability due to family health issues. He further explains:

Initially I was notified by your office about the need to reclassify filing information for categories of independent contributions. I contacted the office about clarification and started working on the hundreds of pages of refilling's. I filed by paper due to complexity of FEC software. After two periods completed, I was then notified that I would need to file electronically passing a certain dollar threshold, which I was not notified of with any of the previous correspondence I was dealing with the office about category classification. I contacted the office and was advised that it was best to refile all of 2018 electronically. I instructed the office I would need assistance and over the next month, played phone tag. When we did connect the instruction was slow but progressed. After several changes, meetings and adjustments, I now understand the online filing process, to some functional degree. I asked if there were any recommended companies to handle these filings and was told they did not have any and I have looked for a company to handle this accounting and there are none in my area.

## Analysis

Political committees required to file reports with the Commission must file in an electronic format if they have received contributions or made expenditures totaling over \$50,000 in a calendar year. 52 U.S.C. § 30104(a)(11) and 11 C.F.R. § 104.18(a). Pages 51-52 of the Commission's *Campaign Guide for Nonconnected Committees* explain the electronic filing requirements as follows:

A nonconnected committee must file all reports and statements electronically if it raises or spends more than \$50,000 in any calendar year, or expects to do so. Committees that are required to file electronically, but that file on paper or fail to file, will be considered nonfilers and may be subject to enforcement action. 104.18(a)(2).

The Treasurer contends that he was not informed of the electronic filing requirement in previous Commission correspondence. Commission records indicate that the mentioned correspondence between the Treasurer and RAD Analyst dealt with reports filed prior to the

Committee reaching the mandatory electronic filing threshold. According to RAD telecoms (written records of telephone conversations), on October 2, 2018, the Treasurer called the RAD Analyst in response to RFAs on the 2017 Year-End Report and 2018 April Quarterly Report. During the conversation, the RAD Analyst informed the Treasurer that he may find it easier to file with FECFile. The Treasurer indicated he would look into electronically filing the 2018 October Quarterly Report. According to the Commission's Electronic Filing Office ("EFO"), the Treasurer downloaded the FECFile software on October 11, 2018.

On October 15, 2018, the Committee filed the 2018 October Quarterly Report on paper. The Treasurer notes in the challenge that he decided to continue filing on paper due to the complexity of FECFile. However, with this report, the Committee crossed the mandatory electronic filing threshold. RAD subsequently generated a notification to alert the respondents that the paper version of the report was not considered filed, and it must be filed in an electronic format. Commission records indicated the notification was sent via email to info@togetherwethrive.me on October 23, 2018.

On December 6, 2018, RAD contacted the Treasurer because it appeared the email was not successfully delivered. At that time, RAD staff believed the failure may have been due to an issue with the Committee's email address. RAD staff left a voicemail requesting that the Committee update its email address on the Form 1 (Statement of Organization) and stated that a courtesy copy of the notice would be mailed to the mailing address of record. On December 7, 2019, RAD mailed the courtesy copy to the mailing address of record.

On January 29, 2019, the Commission received a Form 99 (Miscellaneous Text Submission) in response to the December 6, 2018 phone call and re-mailed notification. The Treasurer expressed his frustration for not being alerted to the electronic filing requirement sooner and mentioned that the email address of record was working appropriately at the time the October 23, 2018 notice was sent.

The Reviewing Officer requested that RAD and the Commission's Office of the Chief Information Officer ("OCIO") further research the cause of the email error. After further analysis, RAD and OCIO linked the email failure to a previously identified issue with the Commission's email server. While OCIO had promptly identified the server error and implemented a solution at that time, the impact on the notification in question was not known until reviewing the facts presented here.

Their challenge fails to adequately address any of the three valid grounds at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. 11 C.F.R. § 104.14(d). Unavailability and inexperience of the Treasurer is specifically included at 11 C.F.R. § 111.35(d) as an example of a circumstance that will not be considered reasonably unforeseen and beyond the respondents' control.

However, the Reviewing Officer recognizes that the Commission did not treat the respondents in accordance with its normal course of conducting business. If the Committee had been notified that it crossed the mandatory electronic filing threshold on October 23, 2018, it may have had sufficient time to prepare an electronic filing of the 2018 Post-General Report by the December 6, 2018 filing deadline.<sup>1</sup> Therefore, the Reviewing Officer recommends that the Commission terminate the proceedings and close the file.

#### **OAR Recommendations**

- 1) Terminate the proceedings in AF# 3655 that Together We Thrive and Christopher Zullo, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and close the file; and
- 2) Send the appropriate letter.

#### **Attachments**

- Attachment 1 –
- Attachment 2 – Pages 51-52 of *Campaign Guide for Nonconnected Committees*
- Attachment 3 –
- Attachment 4 –
- Attachment 5 – Declaration from RAD
- Attachment 6 – Declaration from OAR

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<sup>1</sup> Beginning in early February 2019, the RAD Analyst contacted the Treasurer regarding the Committee's electronic filing requirement. The RAD Analyst provided resources and assistance on a few occasions throughout the month. In early May 2019, the Committee began submitting electronic versions of 2018 reports which were previously filed on paper. On May 28, 2019, the Committee electronically filed the 2018 Post-General Report, 173 days late.



## Filing FEC Reports

### 48-Hour Independent Expenditure Reports

Political committees that make independent expenditures at any time during a calendar year—up to and including the 20th day before an election—must disclose this activity within 48 hours each time that the expenditures aggregate \$10,000 or more with respect to a given election. This reporting requirement is in addition to the requirement to file 24-hour notices of independent expenditures each time that disbursements for independent expenditures aggregate at or above \$1,000 during the last 20 days—up to 24-hours—before an election. 104.4(b) and 104.5(g)(1). For information on such last-minute independent expenditure reports, see page 72.

## 5. Nonelection Year Reporting

Nonelection years are years in which there are no regularly scheduled federal elections (i.e., odd-numbered years).

### Semiannual Reports

During a nonelection year, quarterly filers automatically switch to a semiannual reporting schedule. Nonconnected committees do not need to notify the Commission of this switch. Two semiannual reports are required:

- The mid-year report, covering activity from January 1 through June 30, must be filed by July 31, and
- The year-end report, covering activity from July 1 through December 31, must be filed by January 31 of the following year.

104.5(c)(2)(i).

If the committee makes contributions or expenditures in connection with special elections, it may have additional reporting responsibilities. See "Special Elections" below.

### Monthly Reports

Reports covering each month's activity are due on the 20th of the following month. The first monthly report, covering January, is due February 20; the final monthly report covers November and is due December 20 of the nonelection year. The committee reports December's activity in the year-end report, due the following January 31. 104.5(c)(3).

### Changing Filing Schedule

A committee that filed monthly reports during the election year continues to file monthly during the nonelection year. However, the committee may change to a semiannual filing schedule if it first notifies the FEC of that change in writing.

A committee may change its filing schedule only once per calendar year. 104.5(c).

## 6. Special Elections

Nonconnected committees making contributions or expenditures in connection with a special election may be required to file special election reports, including reports of last-minute independent expenditures (if appropriate). Filing dates for special elections are published in the Federal Register, on the FEC web site and in the FEC Record. (Committees filing on a monthly basis are not required to file special election reports.) 104.5(h)(1).

If a regularly scheduled report is due within 10 days of the date a special election report is due, the Commission may waive the regular report. 104.5(h)(2). Committees should check with the FEC to verify whether a report has been waived.

## 7. Electronic Filing

A nonconnected committee must file all reports and statements electronically if it raises or spends more than \$50,000 in any calendar year, or expects to do so. Committees that are required to file electronically, but that file on paper or fail to file, will be considered nonfilers and may be subject to

enforcement action. 104.18(a)(2). See page 48, "Administrative Fines for Late Filers and Nonfilers."

Because electronic filing is more efficient and cost effective than paper filing, even nonconnected committees that do not meet the \$50,000 threshold requirement are encouraged to file their reports electronically. Please note, however, that voluntary electronic filers must continue to file electronically for the remainder of the calendar year unless the Commission determines that extraordinary and unforeseen circumstances make continued electronic filing impractical. 104.18(b).

## Methods of Electronic Filing

Most committees filing electronically find it convenient to do so via an Internet connection with a password (see "Treasurer's Duties" on page 47). Committees may, however, submit their electronic reports on diskettes or CD (either hand delivered or sent by other means such as U.S. Postal Service). Electronic filers must file all their reports electronically, and the reports must adhere to the FEC's Electronic Filing Specifications Requirements.<sup>5</sup> 104.18(d). Committees filing electronically on diskette or CD must also submit a written certification—signed by the treasurer or assistant treasurer—either on paper (e.g. a signed first page of FEC Form 3X) or as a separate file with the electronic report, verifying that the treasurer has examined the documents and that, to the best of his or her knowledge, the report is correct, complete and true. 104.18(g).

## Calculating the Threshold

Nonconnected committees should use the following formulas to determine if their total expenditures or total contributions are over \$50,000 per calendar year:

**Total Contributions Received<sup>6</sup>**

- Refunds of Contributions
- + Transfers from Affiliated Committees
- = Total Contributions

<sup>5</sup> Available online at the FEC web site [www.fec.gov](http://www.fec.gov) or on paper from the FEC.

<sup>6</sup> Including the outstanding balance of any loans.

or

- Total Federal Operating Expenditures**
- + Federal Contributions Made
- + Transfers to Affiliated Federal Committees
- + Independent Expenditures
- = Total Expenditures

## Have Reason to Expect to Exceed the Threshold

Once nonconnected committees actually exceed the \$50,000 yearly threshold, they have "reason to expect to exceed" the threshold in the following two calendar years. 104.18(a)(3)(i). Consequently, committees must continue to file electronically for the next two calendar years (January through December).

## Committees With No History

New committees with no history of campaign finance activity have reason to expect to exceed the \$50,000 yearly threshold if:

- The committee receives contributions or makes expenditures that exceed one-quarter of the threshold amount in the first calendar quarter of the calendar year (i.e., exceeds \$12,500 by the end of March); or
- The committee receives contributions or makes expenditures that exceed one-half of the threshold amount in the first half of the calendar year (i.e., exceeds \$25,000 by the end of June).

104.18(a)(3)(ii).

## Verification Requirements

The political committee's treasurer must verify the electronically filed reports by:

- Submitting a signed certification on paper along with the computerized media; or
- Submitting a digitized copy of the signed certification as a separate file in an electronic submission.

The signed verification must certify that the treasurer or assistant treasurer has examined the sub-

**DECLARATION OF KRISTIN D. ROSER**

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Together We Thrive:
  - A) Non-Filer Letter, dated December 20, 2018, referencing the 2018 30 Day Post-General Report (sent via electronic mail to: info@togetherwethrive.me);
  - B) Reason-to-Believe Letter, dated March 21, 2019, referencing the 2018 30 Day Post-General Report (sent via overnight mail to the address of record).
4. I hereby certify that I have searched the Commission's public records and find that Together We Thrive has not yet filed the 2018 30 Day Post-General Report with the Commission.
5. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 9<sup>th</sup> day of May, 2019.

*Ben Hall for KDR*  
Kristin D. Roser  
Chief, Compliance Branch  
Reports Analysis Division  
Federal Election Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

December 20, 2018

CHRISTOPHER ZULLO, TREASURER  
TOGETHER WE THRIVE  
3433 LITHIG PINECREST RD  
STE 198  
VALRICO, FL 33596

IDENTIFICATION NUMBER: C00522458

REFERENCE: POST-GENERAL REPORT (10/01/2018 - 11/26/2018)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report or relevant portions must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at [www.fec.gov](http://www.fec.gov).

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Christopher Ritchie in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1146.



### DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A committee not authorized by a candidate shall file a post-general report covering through the 20<sup>th</sup> day after the election no later than 30 days after the election. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on December 6, 2018 for the 2018 Post-General Report to be timely filed.
- 3) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
  - a) Form 99 (Miscellaneous Text Submission) filed by Together We Thrive and Christopher Zullo, in his official capacity as Treasurer, on January 29, 2019.
  - b) Cover, Summary, and Detailed Summary Pages of the 2018 Post-General Report filed by Together We Thrive and Christopher Zullo, in his official capacity as Treasurer. The report includes the coverage period of October 1, 2018 through November 26, 2018 and was electronically filed on May 28, 2019.
- 4) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 13<sup>th</sup> day of June, 2019.

Rhiannon Magruder  
Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review  
Federal Election Commission

Dear Federal Election Commission,

RECEIVED  
FEC MAIL CENTER

2019 JAN 29 PM 2: 10

Committee Name: Together We Thrive

Committee Number: C00522458

I have been attempting to reach your office multiple times for three weeks. I received notification by mail, even though my email is working, that's on file, that I need to file my reports electronically. I was in shock receiving this letter after discussing paper filings with my analyst and giving her my direct number, she didn't inform me of this requirement. I have multiple questions with the online filing system and how some marketing items should be filed. Soon as I can speak with someone to answer my questions, I will have this report refiled and subsequent report filed.

Thank You

Christopher Zullo

Together We Thrive

(407) 491-6671

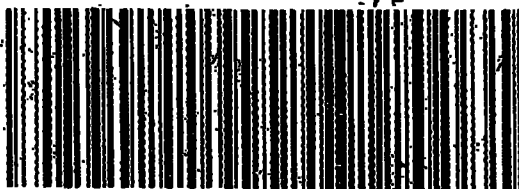
RECEIVED  
REC MAIL CENTER  
2019 JAN 29 PM 2:10

CHRISTOPHER ZULLO  
(407) 491-6834  
THE UPS STORE 44341  
3433 LITHIA PINECREST RD  
VALRICO FL 33596-6302

1 LBS  
SHIP WT: 1 LBS  
DATE: 24 JAN 2019

SHIP FEDERAL ELECTION CAMPAIGN COMM  
TO: 999 E ST NW

SHIP TO: 28/JAN/2019 20:02 2000  
FEDERAL ELECTION COMM -  
1060 1ST ST NE  
FL 9  
WASHINGTON DC 20002 4694  
MD 201 9-58  
1ZV832R00302008662



BILLING P/P

100 13.00K 22P 400 00.00 01/2019

SEE BACK FOR EXTENDED WARRANTY TERMS, AND POLICY OF INSURANCE. WARRANTY IS VOID IF THE PRODUCT IS NOT USED AS INTENDED. WARRANTY IS VOID IF THE PRODUCT IS NOT USED AS INTENDED. WARRANTY IS VOID IF THE PRODUCT IS NOT USED AS INTENDED.



The FEC added this page to the end of this filing to indicate how it was received.

**(3/2015)**

# FEC FORM 3X

## REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12FE4M5

TOGETHER WE THRIVE

ADDRESS (number and street)

3433 Lithia Pinecrest Road

Check if different  
than previously  
reported. (ACC)

STE 198

VALRICO

FL

33596

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C00522458

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

- ☐ April 15  
Quarterly Report (Q1)
- ☐ July 15  
Quarterly Report (Q2)
- ☐ October 15  
Quarterly Report (Q3)
- ☐ January 31  
Year-End Report (YE)
- ☐ July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)
- ☐ Termination Report  
(TER)

(b) Monthly  
Report  
Due On:

- ☐ Feb 20 (M2) ☐ May 20 (M5) ☐ Aug 20 (M8) ☐ Nov 20 (M11)  
(Non-Election  
Year Only)
- ☐ Mar 20 (M3) ☐ Jun 20 (M6) ☐ Sep 20 (M9) ☐ Dec 20 (M12)  
(Non-Election  
Year Only)
- ☐ Apr 20 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

- ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R)
- ☐ Convention (12C) ☐ Special (12S)

Election on

M M / D D / Y Y Y Y Y Y

in the  
State of(d) 30-Day  
POST-Election  
Report for the:

- ☒ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

M M / D D / Y Y Y Y Y Y

in the  
State of

5. Covering Period

M M / D D / Y Y Y Y Y Y

through

M M / D D / Y Y Y Y Y Y

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Zullo, Christopher, . .

Type or Print Name of Treasurer

Signature of Treasurer

Zullo, Christopher, . .

[Electronically Filed]

Date

M M / D D / Y Y Y Y Y Y

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office  
Use  
OnlyFEC FORM 3X  
Rev. 05/2016

# SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

TOGETHER WE THRIVE

Report Covering the Period:

From:

MM / DD / YYYY  
10 / 01 / 2018

To:

MM / DD / YYYY  
11 / 28 / 2018

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, <span>YYYYYY</span> 2018		0.00
(b) Cash on Hand at Beginning of Reporting Period.....	- 11815.07	
(c) Total Receipts (from Line 19).....	15493.26	59938.12
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	3678.19	59938.12
7. Total Disbursements (from Line 31).....	15513.28	71773.19
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	- 11835.07	- 11835.07
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D).....	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D).....	0.00	



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

## For further information contact:

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100



# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3X (Rev. 05/2018)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share .....	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures .....	0.00	0.00
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) .....	0.00	0.00
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees .....	0.00	0.00
24. Independent Expenditures (use Schedule E) .....	15513.26	67492.56
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees .....	0.00	0.00
(b) Political Party Committees .....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0.00	0.00
29. Other Disbursements (Including Non-Federal Donations).....	0.00	4280.63
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share .....	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds .....	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)) .....	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..	15513.26	71773.19
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	15513.26	71773.19

**DETAILED SUMMARY PAGE**  
of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3) .....	15493.26	59938.12
34. Total Contribution Refunds (from Line 28(d)) .....	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33) .....	15493.26	59938.12
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)) .....	0.00	0.00
37. Offsets to Operating Expenditures (from Line 15, page 3) .....	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36) .....	0.00	0.00



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 14, 2019

Christopher Zullo, in official capacity as Treasurer  
Together We Thrive  
3433 Lithig Pinecrest Rd.  
Suite 198  
Valrico, FL 33596

C00522458  
AF#: 3655

Dear Mr. Zullo:

On March 21, 2019, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Together We Thrive and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Post-General Report. The Commission also made a preliminary determination that the civil money penalty was \$684 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission terminate the proceedings in accordance with 11 C.F.R. § 111.37(b) and close the file. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 1050 First Street, NE, Washington, DC 20463 or via facsimile (202-208-3333). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1158 if you have any questions.

Sincerely,

*Rhiannon Magruder*  
Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2019 JUL 16 PM 12:50

**SENSITIVE**

July 16, 2019

**MEMORANDUM**

To: The Commission

Through: Alec Palmer  
Staff Director

From: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 3655 – Together We Thrive and Christopher Zullo, in his official capacity as Treasurer (C00522458)

On March 21, 2019, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Post-General Report and made a preliminary determination that the civil money penalty was \$684 based on the schedule of penalties at 11 C.F.R. § 111.43.

On April 30, 2019, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated June 13, 2019 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission terminate the proceedings in accordance with 11 C.F.R. § 111.37(b) and close the file.

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). To date, a response has not been received.

**OAR Recommendations**

- 1) Terminate the proceedings in AF# 3655 that Together We Thrive and Christopher Zullo, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and close the file; and
- 2) Send the appropriate letter.



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) AF 3655  
Final Determination Recommendation: )  
Together We Thrive and Christopher )  
Zullo, in his official capacity as Treasurer )  
(C00522458) )

CERTIFICATION

I, Laura E Sinram, Acting Secretary and Clerk of the Federal Election  
Commission, do hereby certify that on July 30, 2019, the Commission decided  
by a vote of 4-0 to take the following actions in AF 3655:

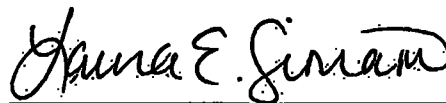
1. Terminate the proceedings in AF# 3655 that Together We Thrive  
and Christopher Zullo, in his official capacity as Treasurer,  
violated 52 U.S.C. § 30104(a) and close the file.
2. Send the appropriate letter.

Commissioners Hunter, Petersen, Walther, and Weintraub voted  
affirmatively for the decision.

Attest:

8/1/19

Date



Laura E Sinram  
Acting Secretary and Clerk of the  
Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 6, 2019

Christopher Zullo, in official capacity as Treasurer  
Together We Thrive  
3433 Lithig Pinecrest Rd.  
Suite 198  
Valrico, FL 33596

C00522458  
AF#: 3655

Dear Mr. Zullo:

On March 21, 2019, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Together We Thrive and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Post-General Report. By letter dated March 21, 2019, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$684 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On April 30, 2019, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission terminate the proceedings in accordance with 11 C.F.R. § 111.37(b) and close the file. The Reviewing Officer Recommendation was sent to you on June 13, 2019.

On July 30, 2019, the Commission adopted the Reviewing Officer's recommendation, and voted to terminate the proceedings with respect to 52 U.S.C. § 30104(a) and close the file. A copy of the Final Determination Recommendation is attached.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

**IDENTIFICATION**

Ellen L. Weintraub

**Attachment**

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 3655

HOBBINSVILLE